

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:15-MJ-524

AMBER LEE SHAW

(01)

CRIMINAL COMPLAINT

Conspiracy to Possess a Controlled Substance with Intent to Distribute

Beginning in or before December of 2013, and continuing until on or about December 2, 2015, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Amber Lee Shaw** along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, in violation of 21 U.S.C. § 846.

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. In 2014, Agents and Officers with the Drug Enforcement Administration (DEA) Fort Worth Resident Office, the Department of Homeland Security (DHS), the Bureau of Alcohol Tobacco Firearms and Explosives (ATF), and the Texas Department of Public Safety (DPS) began an investigation into the methamphetamine trafficking activities of Christopher Lee Nicholson and others.

2. On June 10, 2015, a federal grand jury returned a one count sealed indictment against Chris Nicholson, and others, alleging a violation of 21 U.S.C. § 846. On June 11, 2015, Magistrate Judge Jeffrey L. Cureton signed a Federal Arrest warrant for Christopher Lee

Nicholson. On June 15, 2015, Agents/Officers attempted to locate and arrest Christopher Lee Nicholson at the residence he shared with his girlfriend, Amber Lee Shaw, located in Arlington, Texas. Agents/officers were unable to locate Nicholson and since that date he has been a fugitive.

3. In November 2015, Deputies with the United States Marshal's Service received information that Christopher Lee Nicholson and Amber Lee Shaw were frequently staying at a residence in Grand Prairie, Texas. On December 2, 2015, Deputies established surveillance at the residence in Grand Prairie, Texas. While conducting surveillance, Deputies observed Christopher Lee Nicholson outside of the residence working on his motorcycle.

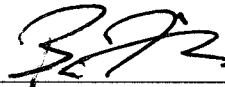
4. On December 2, 2015, Deputies with the United States Marshal's Service observed Christopher Lee Nicholson exit the residence and enter a vehicle that was parked in the driveway of the residence. At that time, Deputies approached the vehicle. As Deputies approached the vehicle, Christopher Lee Nicholson exited the vehicle and attempted to flee, running towards the garage of the residence. Deputies took Christopher Lee Nicholson into custody.

5. A few minutes after Christopher Lee Nicholson was taken into custody Amber Lee Shaw arrived at the residence. Following the arrest of Christopher Lee Nicholson, Agents/Officers conducted a search of both vehicles. During the search, Agents/Officers located and seized approximately 941 grams of methamphetamine, one Makarov, Model IJ-70, 9mm pistol, bearing Serial Number BB0533, drug packaging material, and drug paraphernalia. Agents/Officers then searched the bedroom, belonging to Christopher Lee Nicholson and Amber Lee Shaw and

located multiple large baggies, each containing suspected methamphetamine residue, drug packaging material, and drug paraphernalia.

6. During a post-Miranda interview, Amber Lee Shaw advised Agents and Officers that since approximately December 2013 (when she started dating Christopher Lee Nicholson) she has assisted Christopher Lee Nicholson in the distribution of multi-kilogram quantities of methamphetamine. Specifically, Amber Lee Shaw admitted to delivering methamphetamine, and collecting and counting money (drug proceeds) at the direction of Christopher Lee Nicholson. Amber Lee Shaw also admitted knowledge of the 941 grams of methamphetamine and the handgun that was found inside the vehicle occupied by Christopher Lee Nicholson.

7. Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated here establish probable cause that the defendant has committed a violation of 21 U.S.C. § 846, Conspiracy to Possess Methamphetamine with the Intent to Distribute it.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 2:05 am/~~pm~~, this 3rd day of December, 2015, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge